

9171/RHD  
CICHANOWICZ, CALLAN, KEANE, VENGROW & TEXTOR, LLP  
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Attorneys for Defendant Hanjin Shipping Co. Ltd.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INDEMNITY INSURANCE COMPANY OF  
NORTH AMERICA a/s/o DARIK ENTERPRISES,  
INC.

08 Civ. 5266 (PKC)

**ANSWER TO CROSS-  
CLAIMS**

Plaintiff,

- against -

M/V ASIR, her engines, boilers, tackle, apparel, etc., *in rem*; HANJIN SHIPPING CO., LTD.; UNITED ARAB SHIPPING CO (S.A.G.) and APM TERMINALS, in personam,

Defendants.

Defendant Hanjin Shipping Co. Ltd. ("Hanjin"), by its attorneys, Cichanowicz, Callan, Keane, Vengrow & Textor, LLP, answering the cross-claim of defendant APM Terminals, alleges upon information and belief as follows:

1. Denies the allegations of paragraph 43.
2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 44.

3. Denies the allegations of paragraph 45.

4. Denies the allegations of paragraph 46.

WHEREFORE, Hanjin prays for:

(a) Judgment dismissing the cross-claim;

- (b) An award of all costs including attorneys' fees; and
- (c) Such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
August 25, 2008

Respectfully submitted,

CICHANOWICZ, CALLAN, KEANE,  
VENGROW & TEXTOR, LLP  
Attorneys for Defendant Hanjin Shipping Co. Ltd.

By: s/ Randolph H. Donatelli  
Randolph H. Donatelli (RHD-5359)  
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To: Casey & Barnett, LLC  
317 Madison Avenue, 21<sup>st</sup> Floor  
New York, New York 10017  
(212) 286-0225

Freehill, Hogan & Mahar  
80 Pine Street  
New York, New York 10005  
(212) 425-1900

Cozen O'Connor  
45 Broadway, Suite 1600  
New York, New York  
(212) 509-9400

**CERTIFICATE OF SERVICE BY REGULAR U.S. MAIL AND BY ECF**

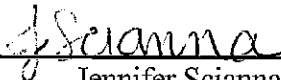
The undersigned declares under penalty of perjury that the following is true and correct:

1. I am over the age of eighteen years and I am not a party to this action.
2. On August 25, 2008, I served a complete copy of Defendant Hanjin Shipping Co. Ltd.'s Answer to Cross-Claims, by regular U.S. mail and by ECF, to the following attorneys at their ECF registered address and at the following address:

To: Casey & Barnett, LLC  
317 Madison Avenue, 21<sup>st</sup> Floor  
New York, New York 10017  
(212) 286-0225

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New York, New York 10005  
(212) 425-1900

Cozen O'Connor  
45 Broadway, Suite 1600  
New York, New York  
(212) 509-9400

  
Jennifer Scianna

DATED: August 25, 2008  
New York, New York